Case 2:16-cr-00188-JLR Document 60-1 Filed 01/04/17 Page 1 of 3

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNITED STATES OF AMERICA

Plaintiff,

VS.

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AMBER HEILMAN-BLANTON.

Defendant.

Case No.: CR16-188JLR

(PROPOSED) ORDER CONTINUING TRIAL AND PRETRIAL MOTIONS DEADLINE

Based on the motion of the defendant to continue the trial date and pretrial motions deadline and the facts set forth therein, which are hereby incorporated by reference and adopted as findings of fact, the court makes the following findings of fact and conclusions of law:

- 1. The ends of justice served by granting this continuance outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C.§ 3161(h)(7)(A).
- 2. Proceeding to trial absent adequate time for the defense to prepare would result in a miscarriage of justice. 18 U.S.C.§ 3161(h)(7)(B(i).
- 3. The defense needs additional time to explore issues of some complexity. including all relevant issues and defenses applicable to the case, which would make it unreasonable, under the circumstances to expect adequate preparation for pretrial proceedings or for trial itself within the time limits established by the speedy trial act and currently set for this case. 18 U.S.C.§ 3161(h)(7)(B)(ii).
- 4. Taking into account the exercise of due diligence, continuance is necessary to allow the defendants the reasonable time for effective preparation of their defense. 18 U.S.C.§ 3161(h)(7)(B)(iv).

AMBER HEILMAN-BLANTON - 161F3123 B11a- Proposed Order-Motion to Continue Trial

Law Offices of ROBERT D. BUTLER 103 E. Holly St. #512 Bellingham, WA 98225 (360) 734-3448

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1	IT IS NOW, THEREFORE, ORDERED that trial shall be continued from January 26, 2017 to, 2017 and pre-trial motions continued from
2	December 13, 2016, to2017, and that the period of time from
3	the filing date of the Motion to Continue until the new trial date shall be excludable time
4	under the Speedy Trial Act pursuant to Title 18, United States Code, Sections
5	3161(h)(7)(A), 3161(h)(7)(B)(ii), 3161(h)(7)(B)(iv) and 18 U.S.C.§ 3161(h)(6).
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8	DATED this 5 day of January, 2017.
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12	JAMÈS L. ROBART UNITED STATES DISTRICT JUDGE
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14	J
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17	Presented by:
18	/s/ Robert D. Butler
19	Robert D. Butler, WSBA#22475 Attorney for Defendant
20	103 E. Holly Street, Suite 512 Bellingham, WA 98225
21	Phone: (360) 734-3448
22	Fax: (360) 734-7975 Email: bob@rdbutlerlaw.com
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Anc

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this day, I electronically filed the foregoing with the clerk of the court using the CM/ECF system which will send notification of such filing to the attorney(s) of the record for all parties. I hereby certify that I have served by any other parties of record that are non CM/ECF participants via Tele-fax or United States Postal Mail.

DATED this 2nd day of January, 2017.

## LAW OFFICES OF ROBERT D. BUTLER

/s/ Jasmin Chigbrow
Jasmin Chigbrow
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